## **EXHIBIT T**

## Paul A. Woodard

From: Ken Hiller < khiller@kennethhiller.com>
Sent: Friday, November 04, 2016 5:17 PM

To: Paul A. Woodard

Cc: sandrews@kennethhiller.com; 'Tim Hiller'

**Subject:** Wagner v. Ilecki

## Paul:

I did not hear from you today, and the deposition was noticed for November 8. I would like to receive written confirmation that either 1) you agree to limit the deposition to questions of Mr. Andrews to the conversation he had with Mr. Ilecki's office, or 2) that you will withdraw the deposition notice based upon our stipulation that Mr. Andrews will not be called as a witness at trial.

If you are not agreeable to numberr 2 above, I will be filing a Motion for a Protective Order on Monday.

Kenneth Hiller Law Offices of Kenneth Hiller PLLC 6000 North Bailey Avenue, Ste. 1A Amherst, NY 14226 716-564-3288